

1 HONORABLE MARSHA J. PECHMAN  
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11 UNITED STATES DISTRICT COURT  
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13 WESTERN DISTRICT OF WASHINGTON  
14  
15 AT SEATTLE  
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18 BRIAN BAKER, a Washington resident,

19 Plaintiff,

NO. 2:19-cv-01182-MJP

20 v.

21 G&I VII REDMOND RETAIL LLC, a  
22 Delaware limited liability company,

23 Defendant.

24 STIPULATED MOTION AND  
25 ORDER FOR STAY OF  
CASE FOR PENDING SETTLEMENT  
NEGOTIATIONS

NOTE ON MOTION CALENDAR:  
Tuesday, October 1, 2019

19  
20 **STIPULATION**

21 Plaintiff Brian Baker and Defendant G&I VII Redmond Retail, LLC (collectively,  
22 “Parties”), by and through their respective undersigned attorneys, hereby move on a stipulated  
23 and agreed basis for an order temporarily staying all litigation in this case while the Parties  
24 engage in settlement negotiations. The parties are attempting to resolve this case at the earliest  
25 possible stage to secure the just, speedy, and inexpensive resolution of this action. See Fed. R.  
Civ. P. 1. In support of the Stipulated Motion, the Parties jointly state as follows:

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27 STIPULATED MOTION AND  
28 ORDER FOR STAY – PAGE 1  
(Civil Action No. 2:19-cv-01182-MJP)

29  
30 GORDON REES SCULLY  
31 MANSUKHANI, LLP  
32 701 5th Avenue, Suite 2100  
33 Seattle, WA 98104  
34 Telephone: 206.695.5100  
35 Facsimile: 206.689.2822

1       1. On July 30, 2019, Plaintiff commenced this civil action by filing his Complaint.

2 Dkt. 1. Defendant has been served with process.

3       2. On October 1, 2019, the Parties through their counsel conferred regarding the  
4 possibility of resolving this case through settlement negotiations, including accessibility  
5 alterations and the amount of reasonable attorney fees and costs, before undertaking significant  
6 litigation and motion practice. It appears that such a resolution is a likely possibility.

7       3. The Parties believe that they can informally exchange necessary information and  
8 engage in productive negotiations in 60 days. However, the Parties agree that these negotiations  
9 would be compromised by simultaneous discovery and motion practice.

10      Based on the foregoing, the Parties respectfully request the Court to enter an Order:

11      (i) Staying this action for all purposes until December 1, 2019, to enable the parties to  
12 focus on and conduct settlement negotiations; and

13      (ii) Scheduling a date for the Parties to file a joint report or other event that will permit  
14 the Parties to update the Court on progress of settlement efforts before or at the conclusion of the  
15 requested stay.

16      IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

17      DATED: Oct. 1, 2019.

GORDON REES SCULLY MANSUKHANI, LLP

19      By: /s/ Sarah N. Turner

Sarah N. Turner, WSBA #37748  
Gordon Rees Scully Mansukhani, LLP  
701 5th Avenue, Suite 2100  
Seattle, Washington 98104  
Tel.: 206.695.5100  
Email: Sturner@grsm.com

23      Attorneys for Defendant  
G&I VII REDMOND RETAIL LLC

25  
STIPULATED MOTION AND [REDACTED]  
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(Civil Action No. 2:19-cv-01182-MJP)

GORDON REES SCULLY  
MANSUKHANI, LLP  
701 5th Avenue, Suite 2100  
Seattle, WA 98104  
Telephone: 206.695.5100  
Facsimile: 206.689.2822

1 DATED: Oct. 1, 2019

WASHINGTON CIVIL & DISABILITY ADVOCATE

2 By: /s/Michael Terasaki

3 Conrad Reynoldson, WSBA #48187  
4 Michael Terasaki, WSBA #  
Washington Civil & Disability Advocate  
5 3513 NE 45<sup>th</sup> Street, Suite G  
Seattle, Washington 98105  
Tel.: 206.876.8515  
Email: Conrad@wacda.com  
Teraskaki@wacda.com

6  
7 Attorneys for Plaintiff  
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**ORDER**

11 Based on the foregoing Stipulation, it is hereby ORDERED that this matter is stayed until  
12 December 1, 2019. All case deadlines are extended until after December 1, 2019. It is further  
13 ORDERED that the parties file a Joint Report regarding the progress of settlement negotiations  
14 on or before December 1, 2019.

15 Dated this 3<sup>rd</sup> of October, 2019.  
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19 THE HONORABLE MARSHA J. PECHMAN  
20 UNITED STATES DISTRICT JUDGE  
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STIPULATED MOTION AND [REDACTED] :  
ORDER FOR STAY – PAGE 3  
(Civil Action No. 2:19-cv-01182-MJP)

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MANSUKHANI, LLP  
701 5th Avenue, Suite 2100  
Seattle, WA 98104  
Telephone: 206.695.5100  
Facsimile: 206.689.2822

1                   **CERTIFICATE OF SERVICE**

2                   The undersigned hereby certifies that on October 1, 2019, I electronically filed the  
3 foregoing document entitled STIPULATED MOTION AND [PROPOSED] ORDER FOR  
4 STAY OF CASE FOR PENDING SETTLEMENT NEGOTIATIONS with the Clerk of the  
5 Court using the CM/ECF system which will send notification of such filing to the following  
6 registered participants and party's counsel of record:

7                   **Case Electronic Mail Notice List:**

8                   • Conrad Reynoldson  
9                    conrad@wacda.com; office@wacda.com  
10                  • Michael M Terasaki  
11                  terasaki@wacda.com; michael@terasakilaw.com; felicity@wacda.com

12                 DATED: October 1, 2019.

13                 */s/ Estela Acosta* \_\_\_\_\_

14                 Estela Acosta, Legal Secretary  
15                 eacosta@grsm.com

16                 STIPULATED MOTION AND [REDACTED]  
17                 ORDER FOR STAY – PAGE 4  
18                 (Civil Action No. 2:19-cv-01182-MJP)

19                 GORDON REES SCULLY  
20                 MANSUKHANI, LLP  
21                 701 5th Avenue, Suite 2100  
22                 Seattle, WA 98104  
23                 Telephone: 206.695.5100  
24                 Facsimile: 206.689.2822